

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Richard Sitcha,
(A95 461 653)

V.

Case No. 04-CV-300090-MAP

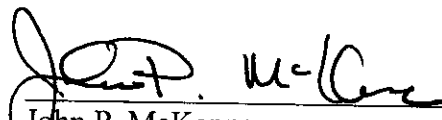
Frederick MacDonald, High
Sheriff, Franklin County
House of Corrections; Tom
Ridge, Secretary, Department
of Homeland Security; Michael
Garcia, Assistant Secretary
(Designee), Bureau of Immigration
and Customs Enforcement (ICE);
Eduardo Aguire, Acting Director,
Bureau of Citizenship and
Immigration Services("CIS");
Bruce Chadbourne, Interim Director,
ICE, Boston, Respondents

FILED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SPRINGFIELD
AUG 10 2004

MOTION TO RELEASE PETITIONER ON BAIL

The Petitioner moves, this court to release the Petitioner on bail with conditions while the Writ of Habeas Corpus is pending. As grounds, please see attached Affidavit and Memorandum.

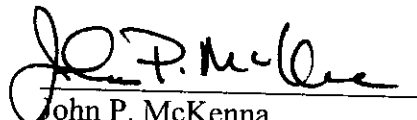
By His Attorney,


John P. McKenna
1537 Main Street, Suite 305
Springfield, MA 01103
413-787-9995
BBO# 630542

Certificate of Service

I hereby certify that I served a copy of the foregoing motion, by hand delivery, this 9th day of August 2004 on:

Assistant United States Attorney
Karen Goodwin
U.S. Attorney's Office
1550 Main Street, Room 310
Springfield, MA 01103


John P. McKenna